

EXHIBIT B

Activity

Checked/Unchecked Indicator: No
Type: Legal Name: Atty-Client Privileged Consult-Other
Status: Completed
Original Notify Date: 10/21/2021
Notify Date: 10/21/2021
Due Date:
Subject: Appeals DLR Referral
Upon Completion Notify: Activity Creator
Upon Completion Notify Linked Claim Owner(s): No
Mark As Priority: No
Activity Owner: Trimiew, Martin
Action:

Request Fields

Request: Bell, Patricia 10/21/2021 12:47:57: ☒ I reviewed the claim manual, consulted with QCC/SME & linked applicable documents ☐ Check if priority.
Reason: ERISA governed? ☒ Yes ☐ No ☐ Unsure Claim Status:
Appeal If requesting meeting, list invitees: List Alternate Contact if
Upcoming Absence: Submitter's Telephone Extension: 58609
Legal Question: Please review the article submitted on appeal and suggest a response. Summary of Facts: On appeal, the attorney submitted a copy of the article by Philip W. Thomas entitled Fifteen Years Later Did The Unum Group Improve Its Erisa Claims Handling Practices? The article is located in the NL entry dated 9/20/2021 entitled "Appeal Letter w/Attachments (Annotated) at pages 16-53.

Created By: Bell, Patricia
Created Date: 10/21/2021 12:47:57 Create Site: Portland

Response Fields

Response: Trimiew, Martin 10/21/2021 16:23:32: Attorney-Client Privileged Communication/Work Product of Martin D. Trimiew, AVP & Legal Counsel
Claimant Name: Tammy Braun - Claim Number: 19410073

Patricia,

I understand you are requesting legal advice regarding whether or not the company is required to specifically respond to the law review article cited in the 09/13 attorney letter. I have reviewed the letter and attachments. In my legal opinion I would recommend addressing the attorney's inclusion of the law review article in your response. In that regard, I recommend you review the claim guideline Claim File Documentation (see Third Party and Misfiled/Duplicate Information). In terms of a written response on this issue, you could consider something along the following lines:

We have reviewed the information you submitted concerning the Philip Thomas Article (Fifteen Year Later), and it does not appear to pertain to your client's individual claim circumstances. Consequently, this information does not affect our evaluation of your client's claim, and we do not consider it to be part of the company's administrative record for your client's claim. This information will, however, be placed in your client's file.

If you have any additional legal questions, feel free to contact me. Thanks.

Martin Trimiew, DLR Counsel

Completed By: Trimiew, Martin
Completed Date: 10/21/2021 16:23:32

Complete Site: Chattanooga